

## **REMARKS/ARGUMENTS**

The Office Action dated January 3, 2007 has been reviewed and carefully considered. Claims 12-17 and 19-24 are pending in this application, with claim 12 being the only independent claim. Claims 12, 14 and 16 have been amended. Claims 23 and 24 have been added. Reconsideration of the application, as herein amended and in view of the following remarks, is respectfully requested.

### **Rejection of Claims Over Prior Art**

Claims 12-15, 17, 19, 21, and 22 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 4,889,051 (*Sarda*) in view of U.S. Patent No. 6,435,086 (*Rendelmann*) and U.S. Patent No. 6,024,015 (*Dillig*).

Claims 16 and 20 stand rejected under 35 U.S.C. §103 as being unpatentable over *Sarda* in view of *Rendelmann* and *Dillig*, and further in view of U.S. Patent No. 5,794,531 (*Keller*).

### **Allowability of Claim 12**

Independent claim 12 has been amended to include a feature of claim 16. Support for this amendment can be found in Figs. 1 and 2, original claim 16 and page 4, lines 16-22 of the specification.

Amended claim 12 now recites, *inter alia*, the following:

“a plurality of rolls arranged between said side walls;

guides arranged on and extending along the respective side walls of said inking unit and configured to interact with complementary guides on side walls of the printing unit so that said inking unit is insertable into and removable from the printing unit by said guides” (emphasis added).

Applicants respectfully submit that amended claim 12 is patentable over the combination of *Sarda*, *Rendelmann*, *Dillig* and *Keller* because the combination of *Sarda*, *Rendelmann*, *Dillig* and *Keller* fails to teach or suggest the above-quoted limitations of amended claim 12.

On page 5 of the Office Action, when rejecting original claim 16, the Examiner explicitly acknowledges that the combination of *Sarda*, *Rendelmann* and *Dillig* fails to teach guides. To bridge this “gap” between original claim 16 and the combination of *Sarda*, *Rendelmann* and *Dillig*, the Examiner refers to Fig. 8 of *Keller*, and contends that *Keller* teaches guides, and an inking unit which is insertable into a printing unit by the guides.

*Keller* fails to teach or suggest the above-cited limitations of amended claim 12.

Figs. 7 and 8 of *Keller* show a rotary offset printing press 400 which includes a press frame 408 and an inking unit 410 which can be brought next to and aligned with the press frame 408 by a horizontal slide mechanism 412. A blanket cylinder 404 and a plate cylinder 406 are operatively mounted inside the press frame 408. The inking unit 410 includes a frame 414, an ink reservoir 416, a plurality of ink transfer and smoothing rollers 418 by which ink is supplied to form rollers 420 and 421. The horizontal slide mechanism 412 includes a first guide track 424, a corresponding first slide plate 426, a second guide track 442 and a corresponding second slide plate 444. In Fig. 7, the guide tracks 424, 442 are mounted on the press frame 408 while the slide plates 426, 444 are mounted on the frame 414 of the inking unit 410. In Fig. 8, the relative positions of the guide tracks 424, 442 and the slide plates 426, 444 are reversed. *See* Figs. 7 and 8; col. 10, line 53 to col. 11, line 4; col. 11, lines 5-28; and col. 12, lines 62-64 of *Keller*.

However, as clearly shown in Figs. 7 and 8 of *Keller*, the guide tracks 424, 442 or the slide plates 426, 444 are arranged substantially parallel to the rollers 418, 420, 421 (*see* also col. 11, lines 11-17 of *Keller*). In other words, in *Keller* the guide tracks 424, 442 or the slide plates 426, 444 do not extend along the respective side walls of the inking unit 410, between which side walls the rollers 418, 420, 421 are arranged. Therefore, *Keller* fails to teach or suggest the

limitations “guides arranged on and extending along the respective side walls of said inking unit” of amended claim 12 of the present application (emphasis added).

In *Keller*, since the guide tracks 424, 442 or the slide plates 426, 444 are arranged substantially parallel to the rollers 418, 420, 421, the inking unit 410 is brought next to or removed from the press frame 408 in a direction which is substantially parallel to the rollers 418, 420, 421. In sharp contrast, in the present invention, since the guides 14, 15 are arranged on and extend along the respective side walls 8, 9 which are substantially perpendicular to the rolls 2-7 (see Figs. 1 and 2), the inking unit 1 is insertable into and removable from a printing unit in a direction which is substantially perpendicular to, i.e., radial to, the rolls 2-7.

It is noted that in *Keller* it is impractical to dispose the guide tracks 424, 442 or the slide plates 426, 444 in a direction perpendicular to the rollers 418, 420, 421 because the dampening unit 452 substantially limits the usable length of the side walls of the inking unit 410 in that direction. Thus, *Keller* teaches away from extending guides along the respective side walls of the inking unit.

Furthermore, it is noted that in *Keller* the inking unit 410 is not inserted into the press frame 408. Rather, the inking unit 410 is simply brought next to and aligned with the press frame 408 by the horizontal slide mechanism 412 (see Figs. 7 and 8 of *Keller*). At this aligned position, a mechanism 422 of the inking unit 410 vertically moves the form rollers 418, 421 into and out of ink transfer rolling engagement with the plate cylinder 406 of the press frame 408. Therefore, *Keller* also fails to teach or suggest the limitations “guides ... configured to interact with complementary guides on side walls of the printing unit so that said inking unit is insertable into and removable from the printing unit by said guides” of amended claim 12 of the present application (emphasis added).

In view of the foregoing, withdrawal of the 35 U.S.C. 103 rejection of claim 12 is respectfully requested.

Allowability of Claims 13-17 and 19-24

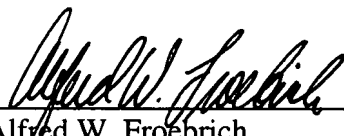
Dependent claims 13-17 and 19-24, each being dependent on independent claim 12, are allowable for at least the same reasons as is independent claim 12, as well as for the additional limitations recited therein.

**Conclusion**

In view of the foregoing, the application is now deemed to be in condition for allowance and notice to that effect is respectfully solicited.

Respectfully submitted,

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